

CASE NO. 1:20CV168  
State of MS  
VS. People's Republic of China  
P-19 et al  
PLAINTIFF'S EXHIBIT  
DATE \_\_\_\_\_ IDEN.  
DATE 2-10-2025 EVID.  
BY Karen Butler  
Deputy Clerk

AO 386

Penalties for Violations of Hoarding PPE								
HS Code	Category	\$ Value of US Imports from China in 2019	% Change in 2020 Exports from 2019	Lost Value (\$ Hoarded by China)	Prices According to Cambridge Study	MS GDP (Percent of the US)	# of Items Hoarded/Violations	Maximum Per 75-24-19 (MS Consumer Protection Act)
6307.90	Masks	\$ 3,171,956,472	-19%	\$ 602,671,729.68	\$ 0.45	0.50%	6,696,353	\$ 66,963,525,520.00
6210.10	Garments	\$ 440,561,626	-21%	\$ 92,517,941.46	\$ 6.60	0.50%	70,089	\$ 700,893,495.91
6210.30	Women's or Girls' Protective Garments	\$ 55,082,976	-48%	\$ 26,439,828.48	\$ 6.60	0.50%	20,030	\$ 200,301,730.91
6210.40	Men's Or Boys' Protective Garments	\$ 323,357,757	-28%	\$ 90,540,171.96	\$ 6.60	0.50%	68,591	\$ 685,910,393.64
4015.11	Surgical Rubber Gloves	\$ 1,081,073	-8%	\$ 86,485.84	\$ 0.12	0.50%	3,604	\$ 36,035,766.67
3926.20	Plastic Gloves	\$ 863,056,388	-13%	\$ 112,197,330.44	\$ 0.12	0.50%	4,674,889	\$ 46,748,887,683.33
4015.19	Other Rubber Gloves	\$ 252,443,610	-35%	\$ 88,355,263.50	\$ 0.12	0.50%	3,681,469	\$ 36,814,693,125.00
6116.10	Knitted Gloves	\$ 363,733,689	-21%	\$ 76,384,074.69	\$ 0.12	0.50%	3,182,670	\$ 31,826,697,787.50
6216.00	Textile Gloves	\$ 195,084,793	-30%	\$ 58,525,437.90	\$ 0.12	0.50%	2,438,560	\$ 24,385,599,125.00
							<b>20,836,254</b>	<b>\$ 208,362,544,627.96</b>

Total Maximum of Possible Penalties \$ 208,362,801,127.96

**NOTE**

75-21-7 allows a penalty for each month in which there is a violation of no less than \$100 and no more than \$2,000

For forestalling and engrossing PPE, the penalty is \$300 - \$6,000 per 75-21-7 (three months total)

75-21-9 authorizes an additional penalty of \$500

75-24-19 authorizes a penalty per violation of no more than \$10,000 per violation

We also find 9 violations per category for the unlawful price hikes for PPE and 16 violations for unfair and deceptive trade practices under 75-24-19 in addition to the hoarding of PPE violations shown above

**Columns A, B, C and D:** Exhibit 3 - Sutter, COVID-19 - China Medical Supply Chains and Broader Issues

**Column E:** Lost Value = \$ Value of US Imports from China in 2019 X % Change in 2020 Exports from 2019

**Column F:** Mena Lora A, Ali M, Spencer S, Takhsh E, Krill C, Bleasdale S. Cost of Personal Protective Equipment During the First Wave of COVID-19.

Antimicrobial Stewardship & Healthcare Epidemiology. 2021;1(S1):s49-s49. doi:10.1017/ash.2021.94

\*The column represents the average prices of PPE during the first wave of COVID-19

**Column G:** Bureau of Economic Analysis: <https://www.bea.gov/sites/default/files/2021-03/qgdpstate0321.pdf>

**Column H:** # of Items Hoarded = Lost Value ÷ Prices According to Cambridge Study

**Column I:** # of Items Hoarded X 10,000